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Claims 1-17 are pending in this Application. Applicant respectfully submits the following remarks and requests reconsideration based on a clear distinction between the cited art and the presently claimed invention, as described below.

Claims 1-19 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,603,526 to Kim et al. (hereinafter *Kim*). Applicant respectfully traverses this rejection in its entirety. Applicant understands that the upper bound of Claim 19 in the claim rejection is a typographical error and respectfully requests that remarks drawn to only Claims 1-17 be considered as fully responsive.

Applicant respectfully submits that *Kim* teaches a requirement ("is set") that the distance between a counter electrode branch 23b and an adjacent pixel electrode branch 24b is smaller than the respective widths. As reproduced below, *Kim* states:

"Further, the distance between the diagonal branch 23b and the second electrode 24b is set such that the distance is smaller than their respective widths." (emphasis added, *Kim* col. 6 lines 56-58).

In the present Office Action, it is asserted on page 2 that "Kim discloses the width(s) of the counter electrode of 4 μm (see at least col. 6, lines 33-34) and the distance between the electrodes of 3 μm (see at least col. 6, lines 53-55)." Applicant respectfully submits that the cited portions of the

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Kim disclosure support Applicant's assertions in the prior response, and that this conclusion stated in the Office Action actually affirms the assertion that Kim does not teach the presently claimed invention. To demonstrate this, the cited portions from Kim are reproduced and emphasized below for clarity:

"The diagonal branches 23b of the counter electrodes 23 are disposed with a regular distance and their widths are set in the range of approximately 2~4 um." (emphasis added, Kim col. 6 lines 31-34).

And,

"In addition, the distance between the diagonal branch 23b and the second electrode 24b is set in the range of approximately 0.5~3 um, and preferably 1 um in the present embodiment." (emphasis added, Kim col. 6 lines 53-56).

In combination with the immediately succeeding sentence quoted above (Kim col. 6 lines 56-58), Kim teaches the distance between the diagonal branch 23b and the second electrode 24b is smaller than their respective widths. Further, a person of ordinary skill in the art could not understand the ranges taught for the widths of 2~4 um and the ranges taught for the distances 0.5~3 um would teach or include a structure where the width of an electrode is 2 um and the distance between adjacent electrodes is 3 um since Kim specifically requires the distance "is set" such that the distance is smaller than their respective widths (Kim col. 6 lines 53-58). In contrast, independent Claim 1 recites "the distance between a one of the plurality of common electrodes

and an adjacent one of the plurality of pixel electrodes is greater than the respective width of the one of the plurality of common electrodes and the adjacent one of the plurality of pixel electrodes" (emphasis added). This limitation of independent Claim 1 is neither taught nor suggested by Kim. Independent Claims 5 and 14 also recite this limitation. Therefore, Applicant respectfully submits that independent Claims 1, 5, and 14 patentably distinguish over Kim and that the corresponding dependent claims 2-4, 6-13, and 15-17 patentably distinguish at least based on their dependence from a distinguished independent claim. Therefore, Applicant respectfully requests the rejection of Claims 1-17 under 35 U.S.C. 103(a) be withdrawn.

Applicant notes with appreciation the detailed Response to Arguments, section 3, provided in the instant Office Action and the restatement of the conclusion "Kim discloses the width(s) of the counter electrode of 4 μm (see at least col. 6, lines 33-34) and the distance between the electrodes of 3 μm (see at least col. 6, lines 53-55)", as discussed above. Applicant understands the second paragraph of section 3 to be a typographical error, since it appears to state the opposite of the third paragraph of section 3.

In view of the foregoing, Applicants respectfully requests the withdraw all rejections and timely issuance of a Notice of Allowance for all pending claims. If the Examiner

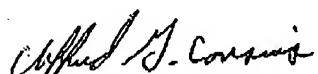
believes a telephone conference would be helpful to discuss any aspect of this application, a call to the undersigned is both welcomed and encouraged.

Certification of Facsimile Transmission
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Monique M. Butler

November 7, 2006
Date of Signature

Respectfully submitted,



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